

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA

v.

CHANGPENG ZHAO,

Defendant.

No. CR23-179 (RAJ)

MOTION TO SEAL DEFENDANT'S  
RESPONSE TO GOVERNMENT'S  
SUPPLEMENTAL SENTENCING  
MEMORANDUM

*Note on Motion Calendar:  
May 13, 2024*

Defendant Changpeng Zhao moves to file his response ("Response") to the Government's Supplemental Sentencing Memorandum under seal because the Response contains confidential and sensitive information. This motion relies upon the same arguments set forth in Mr. Zhao's Motion to Seal the Unredacted Version of Defendant's Sentencing Submission, and Mr. Zhao incorporates those arguments herein by reference. *See* Dkt. 79.

Accordingly, Mr. Zhao moves for leave to file the Response under seal.

1 Dated this 29th day of April, 2024.

2 By: /s/ Benjamin Naftalis  
3 Benjamin Naftalis (*pro hac vice*)  
4 LATHAM & WATKINS LLP  
5 1271 Avenue of the Americas  
6 New York, NY 10020  
7 Tel: (212) 906-1200  
8 Fax: (212) 751-4864  
9 benjamin.naftalis@lw.com

10 William Burck (*pro hac vice*)  
11 Avi Perry (*pro hac vice*)  
12 QUINN EMANUEL URQUHART &  
13 SULLIVAN, LLP  
14 1300 I Street NW, Suite 900  
15 Washington, D.C. 20005  
16 Tel: (202) 538-8000  
17 Fax: (202) 538-8100  
18 williamburck@quinnemanuel.com  
19 aviperry@quinnemanuel.com

20 /s/ Mark Bartlett  
21 Mark Bartlett  
22 DAVIS WRIGHT TREMAINE LLP  
23 920 Fifth Avenue  
24 Suite 3300  
25 Seattle, WA 98104  
26 Tel: (206) 757-8298  
27 markbartlett@dwt.com

28 *Attorneys for Defendant Changpeng Zhao*

*I certify that this memorandum contains 71 words, in compliance with the Local Criminal Rules.*

**CERTIFICATE OF SERVICE**

I, Benjamin Naftalis, hereby certify that on April 29, 2024, I electronically filed the foregoing with the Clerk of Court by email.

/s/ Benjamin Naftalis  
Benjamin Naftalis (*pro hac vice*)  
LATHAM & WATKINS LLP  
1271 Avenue of the Americas  
New York, NY 10020  
Tel: (212) 906-1200  
Fax: (212) 751-4864  
benjamin.naftalis@lw.com